

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NORTH DAKOTA

In re:	)	
	)	
Pro-Mark Services, Inc.	)	Case No. 24-30167
	)	(Chapter 7)
Debtor.	)	
_____	)	
	)	
Erik A. Ahlgren, as Chapter 7 Trustee of	)	
Bankruptcy Estate of Pro-Mark Services,	)	Adv. Case No. 24-07014
Inc., and as Administrator of the Pro-Mark	)	
Services, Inc. Employee Stock Ownership	)	
Plan,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
Connie Berg, Kyle Berg, Connie Berg	)	
Revocable Living Trust, Kyle R. Berg	)	
Revocable Living Trust, Chad DuBois,	)	
Mandy Grant, and Miguel Paredes,	)	
	)	
Defendants.	)	

**MOTION TO EXTEND TIME FOR CHAD  
DUBOIS TO FILE RESPONSIVE PLEADING**

Comes now Chad DuBois (“Mr. DuBois”), by and through undersigned counsel, pursuant to Federal Rule of Civil Procedure 9006, and moves this Honorable Court to extend the deadline for Mr. DuBois to file a pleading in response to the Amended Complaint (the “Amended Complaint,” as found at DE #11) of the plaintiff herein (the “Plaintiff”), and in support thereof states as follows:

The Amended Complaint is 100 substantive pages in length, with some 493 numbered paragraphs. While the pleading was certainly carefully analyzed in connection with earlier briefing on a motion to dismiss, DE #55, formally answering the same does still require a notable

commitment of time. Further, as intimated at a hearing on the foregoing motion, an answer is likely to be accompanied by various affirmative defenses and, potentially, one or more counterclaims and/or cross-claims.

Counsel for the Plaintiff has graciously consented to a one week extension of the current deadline for Mr. DuBois to formally respond to the Amended Complaint and, in light of both the size of the underlying pleading and the likely intricacy of a response thereto, it is respectfully submitted such is a reasonable provision of additional time.

WHEREFORE, Mr. DuBois respectfully prays this Honorable Court (i) allow him to and through May 9, 2025 to respond to the Amended Complaint; and (ii) afford such other and further relief as may be just and proper.

Respectfully Submitted,

Dated: May 2, 2025

By: /s/ Maurice B. VerStandig  
Maurice B. VerStandig, Esq.  
The Dakota Bankruptcy Firm  
1630 1st Avenue N  
Suite B PMB 24  
Fargo, North Dakota 58102-4246  
Phone: (701) 394-3215  
mac@dakotabankruptcy.com  
*Counsel for Mr. DuBois*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 2nd day of May, 2025, a copy of the foregoing was served electronically upon filing via the ECF system.

/s/ Maurice B. VerStandig  
Maurice B. VerStandig